UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

In the Matter of Arbitration between, :

FORALL USA, INC., : Civil Action No.

Petitioner, : NOTICE OF PETITION FOR

ORDER AND JUDGMENT CONFIRMING ARBITRATION

v. : AWARD

SARAH LLC, HALA SUBH, SUHAD ALBASHA, BACHAR HAMAD and AMAR HAMAD,

:

Respondents.

PLEASE TAKE NOTICE, that upon the annexed Petition for Order and Judgment Confirming Arbitration Award dated March 30, 2021 (herein "Petition"), the accompanying Memorandum of Law in Support dated March 30, 2021, and Declaration of Stephen J. Brown, Esq., dated March 30, 2021, and the exhibits attached thereto; Petitioner hereby petitions this Court to be heard at such date and time designated by the Court, at the United States District Court for the Southern District of New York, 40 Foley Square, Room 1306, New York, New York 10007, for an order and judgment pursuant to the Federal Arbitration Act, 9 U.S.C. §9, et seq., confirming the Award of Arbitrator dated January 25, 2021 ("Arbitration Award"), in the matter of claimants Sarah LLC ("Sarah"), Hala Subh, Suhad Abasha, Bachar Hamad and Amar Hamad (collectively referred herein as "Claimants") and respondent Forall USA Inc., American

Arbitration Association, Case No. 01-18-0000-6180 (the "Arbitration"), and for other such relief set forth in the Petition and as the Court may find just and equitable.

Dated: White Plains, New York March 30, 2021

Respectfully submitted,

By: /s/ Stephen G. Brown
Stephen J. Brown (SJB4903)
BLEAKLEY PLATT & SCHMIDT, LLP
Attorneys for Petitioner
One North Lexington Avenue
White Plains, NY 10601
(914) 949-2700